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Proposed Attorneys for Russell Wayne Lester

UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF CALIFORNIA

SACRAMENTO DIVISION

In re:

RUSSELL WAYNE LESTER, an
individual, dba Dixon Ridge Farms,

Debtor.

CASE NO.: 20-24123

Chapter 11

DCN: FWP-1

[NO HEARING REQUIRED]**DECLARATION OF THOMAS A. WILLOUGHBY IN SUPPORT OF APPLICATION
FOR ORDER MODIFYING LOCAL RULE 9014-1(d) TO ALLOW OMNIBUS
PLEADINGS RESPECTING FIRST DAY MOTIONS**

I, Thomas A. Willoughby, declare:

1. I am an attorney duly licensed to practice law in the State of California and a partner with Felderstein Fitzgerald Willoughby Pascuzzi & Rios LLP, the proposed general bankruptcy counsel for Russell Wayne Lester, the Debtor and Debtor in Possession herein (the "Debtor"). If called as a witness, I would and could testify competently as to the matters stated herein.

2. I submit that the First Day Motions are the standard first day requests for relief, and will all be served on the same parties in interest. It will significantly reduce additional filings and services required (e.g., four applications for order shortening time), will avoid unnecessary

1 repetition in multiple pleadings, and as such, will be more understandable for the creditors to
2 review the relief requested.

3 3. I further submit that with respect to the Omnibus Declaration, it will only contain
4 the overall history of the case, and each motion will have a separate Declaration detailing the
5 facts pertinent to that motion without duplication of the background of the case and the farming
6 operation.

7 4. With respect to the background facts in the application, I state those based on
8 information and belief from documents provided to me before this Chapter 11 filing. The
9 Declarations filed with the First Day Motions will provide this same information and a more
10 detailed overview of the facts of this case.

11 I declare under penalty of perjury that the foregoing is true and correct. Executed on
12 August 28, 2020, at Sacramento, California.

13 /s/ Thomas A. Willoughby
14 THOMAS A. WILLOUGHBY
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